

REMARKS

In the Office Action¹, the Examiner took the following actions:

Rejected claims 1-19, 27-34, 36, 40-58, and 66-84 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Application No. 2002/0184610 to Chong et al. ("*Chong*"); and

Rejected claims 21-26, 39, 60-65, and 86-91 under 35 U.S.C. § 103(a) as being unpatentable in view of *Chong*.

Applicants have amended claims 14, 21, 39, 53, 60, 79, and 86, and withdrawn claims 20, 37, 38, 59, and 85. Claims 1-19, 21-34, 36, 39-58, 60-84, 86-91 remain pending.

I. Regarding the rejections of claims 1-19, 27-34, 36, 40-58, and 66-84 under 35 U.S.C. §102(e) as being anticipated by *Chong*

Applicant respectfully traverses the rejection of claims 1-19, 27-34, 36, 40-58, and 66-84 under 35 U.S.C. § 102(e) as being anticipated by *Chong*. In order to properly establish that *Chong* anticipates Applicants' claimed invention under 35 U.S.C. § 102, each and every element of each of the claims in issue must be found, either expressly described or under principles of inherency, in that single reference. Furthermore, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." See M.P.E.P. § 2131, quoting *Richardson v. Suzuki Motor Co.*, 868 F.2d 1126, 1236, 9 U.S.P.Q.2d 1913, 1920 (Fed. Cir. 1989).

Claim 1 recites a method including, for example:

receiving first data reflecting a class file that implements an interface;

¹ The Office Action contains a number of statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicant declines to automatically subscribe to any statement or characterization in the Office Action.

receiving second data reflecting a data representation file that specifies the environment, input parameters, and output parameters for the class; [and]
packaging the first and second data;

(emphasis added). *Chong* does not teach or suggest at least these elements of claim 1.

Chong states that a “controller is a deterministic, finite automaton, illustrating all possible states, transitions and user interaction paths allowed by an application,” (paragraph [0132]), where state “is the condition of a controller at a given instance in time, including its configurations, attributes, and/or information content. Attributes of a state include a list of actions to perform (see ‘Action’) and views (see ‘View’),” (paragraph [0159]). *Chong* further explains that a view is “A user interface that is presented to the end user. A view allows a user to interact with that user interface. A view might take the form of visual, audio, tactile feedback. Views are assigned as properties of a state,” (paragraph [0172]) where “Model-View-Controller design approach separates the application data from the user interface and application behavior,” (paragraph [0213]). The interface in *Chong* is implemented by the controller, further it is kept separate from the class file. Moreover, “[i]t should be appreciated that views do not have direct access to the variables,” (paragraph [0355]). Therefore, *Chong* does not teach or suggest the claimed combination of elements including, for example, “receiving first data reflecting a class file that implements an interface” and “packaging the first and second data,” as recited in claim 1.

The Examiner cites the adapter-class (paragraph [0133]) of *Chong* as allegedly disclosing the claimed “receiving first data reflecting a class file that implements an interface” and cites the JAR file (paragraphs [0431-0434]) of *Chong* as allegedly

disclosing the claimed “packaging the first and second data” (Office Action at pages 2 and 3). This is not correct.

The data adapter in *Chong* “is a pre-built class (see ‘Class’) that provides a mechanism for instantiation of user objects for each particular type of object such as Java Bean, or EJB, and encapsulates their details from their usage,” (paragraph [0133]). However, as noted above, the interface in *Chong* is implemented by the controller and is kept separate from the class field. Therefore, *Chong* does not teach or suggest “receiving first data reflecting a class file that implements an interface” and “packaging the first and second data,” as recited in claim 1.

For at least these reasons, *Chong* cannot anticipate claim 1. Claims 2-11 depend from claim 1 and are thus also allowable over *Chong* for at least the same reasons as claim 1. Independent claims 12, 14, 27, 31, 40, 51, 53, 66, 77, and 79, while of different scope, recite elements similar to those of claim 1 and are thus allowable over *Chong* for at least the same reasons discussed above with respect to claim 1. Claims 13, 15-19, 28, 29, 41-50, 52, 54-58, 67-76, 78, and 80-84 are also allowable at least due to their dependence from claims 27, 40, and 66, respectively.

Regarding the rejection of claim 30, *Chong* does not teach or suggest every element of claim 30. For example, claim 30 recites “a first hashtable reflecting data values to be used as input argument in a method, and a second hashtable reflecting output arguments of the method” (emphasis added). Neither the cited portions of *Chong*, nor any other portions, teach or suggest this feature. The Examiner cites the functional black-box interface of *Chong* as allegedly disclosing the claimed “a first hashtable reflecting data values to be used as input argument in a method, and a

second hashtable reflecting output arguments of the method” (Office Action at page 6).

This is not correct.

The black-box interface in *Chong* “allows variables to be passed in and out of the component” (paragraph [0431]). However, allowing variable to be passed in and out does not constitute the claimed “first hashtable reflecting data values to be used as input argument” and “a second hashtable reflecting output arguments.” Therefore, *Chong* does not teach or suggest at least the recited elements of claim 30.

For at least these reasons, *Chong* cannot anticipate claim 30. Independent claims 32 and 34 while of different scope, recite elements similar to those of claim 30 and are thus allowable over *Chong* for at least the same reasons discussed above with respect to claim 30. Claims 33 and 36 are also allowable at least due to their dependence from claims 32 and 34, respectively.

II. Regarding the rejections of claims 21-26, 39, 60-65, and 86-91 under 35 U.S.C. § 103(a) as being unpatentable in view of *Chong*

Applicant respectfully traverses the Examiner’s rejection of claims 21-26, 39, 60-65, and 86-91 under 35 U.S.C. § 103(a) as being unpatentable in view of *Chang*. A *prima facie* case of obviousness has not been established with respect to these claims.

The key to supporting any rejection under 35 U.S.C. § 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious. Such an analysis should be made explicit and cannot be premised upon mere conclusory statements. *See M.P.E.P. § 2142, 8th Ed., Rev. 6 (Sept. 2007)*. “A conclusion of obviousness requires that the reference(s) relied upon be enabling in that it put the public in possession of the claimed invention.” *M.P.E.P. § 2145*. Furthermore, “[t]he

mere fact that references can be combined or modified does not render the resultant combination obvious unless the results would have been predictable to one of ordinary skill in the art” at the time the invention was made. *M.P.E.P. § 2143.01(III), internal citation omitted*. Moreover, “[i]n determining the differences between the prior art and the claims, the question under 35 U.S.C. § 103 is not whether the differences themselves would have been obvious, but whether the claimed invention as a whole would have been obvious.” *M.P.E.P. § 2141.02(I), internal citations omitted* (emphasis in original). In this application, a *prima facie* case of obviousness has not been established because Examiner has not clearly articulated a reason why the prior art would render the claimed invention obvious to one of ordinary skill in the art.

Independent claims 21, 39, 60, and 86 while of different scope, recite elements similar to those of claim 1. As discussed above, *Chong* does not teach or suggest each and every element of claim 1.

Applicants submit that *Chong* does not disclose each and every element of claims 21, 39, 60, and 86. *Chong* fails to disclose or suggest among other things “receiving a first file reflecting a class file that implements an interface and a second file,” as recited in claims 21 and 60, “receive a first file reflecting a class file that implements an interface,” as recited in claim 39, and “means for receiving a first file reflecting a class file that implements an interface and a second file,” as recited in claim 86.

Moreover, one of ordinary skill, reading *Chong* would be taught that in *Chong* the interface is implemented by the controller of *Chong*, where the interface is kept separate from the class file and “It should be appreciated that views do not have direct access to

the variables," (paragraph [0355]). Thus, one of ordinary skill would not be motivated to modify the *Chong* to achieve the claimed combination, since *Chong* teaches away from the claimed invention. Accordingly, no reason has been clearly articulated as to why *Chong* would render the claimed invention obvious to one of ordinary skill in the art. Thus no *prima facie* case of obviousness has been established with respect to claims 21, 39, 60, and 86. Claims 22-26, 61-64, and 85-91 depend from claims 21, 60, and 86 and are therefore also allowable.

Accordingly, for at least the above-noted reasons, withdrawal of the 35 U.S.C. § 103(a) rejection is respectfully requested.

CONCLUSION

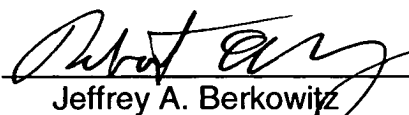
In view of the foregoing amendments and remarks, Applicant respectfully requests reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

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By:  #27432
for Jeffrey A. Berkowitz
Reg. No. 36,743